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9 UNITED STATES BANKRUPTCY COURT
10 CENTRAL DISTRICT OF CALIFORNIA – SANTA ANA DIVISION

11 In re

12 JAMIE LYNN GALLIAN,
13 Debtor.

Case No. 8:21-bk-11710-SC

Chapter 7

JOINDER IN SUPPORT OF TRUSTEE'S
MOTION TO AUTHORIZE SALE OF
MANUFACTURED HOME CURRENTLY
LOCATED AT 16222 MONTEREY LANE,
SPACE 376, HUNTINGTON BEACH, CA
92649, DECAL NO. LBM1081, FREE AND
CLEAR OF LIENS AND HOMESTEAD
EXEMPTION

Date: March 4, 2025
Time: 11:00 a.m.
Ctm: 5C

22 TO THE HONORABLE SCOTT C. CLARKSON, UNITED STATES BANKRUPTCY JUDGE,
23 THE DEBTOR, AND ALL INTERESTED PARTIES:

24 Houser Bros. Co., dba Rancho Del Rey Mobile Home Estates ("Houser Bros.") hereby joins
25 the motion of Chapter 7 Trustee, Jeffrey I. Golden ("Trustee"), under 11 U.S.C. § 363, and Local
26 Bankruptcy Rules 6004-1(c) and 9013-1, for an order authorizing the sale of the 2014 Skyline
27 Custom Villa manufactured home, decal no. LBM1081 ("Property") currently located at 16222
28

1 Monterey Lane, Space #376, Huntington Beach, CA 92649 (“Space”), filed on January 31, 2025, as
2 Dk. No. 539 (“Motion”), and fully incorporates the Trustee’s arguments as fully set forth therein.

3 Houser Bros. does, however, seek to make one clarification to the Motion. The Motion
4 provides: “The Property to be sold does not include the ground lease for the Space (the ‘Ground
5 Lease’), which was deemed rejected long ago. However, the Association (Houser Bros.) has agreed
6 to give any qualified buyer – but not the Debtor, a new ground lease.” Motion at 6. That correctly
7 states Houser Bros.’s position with one clarification - any proposed buyer must contact Houser Bros.
8 and apply for and be approved for a lease. Houser Bros. agrees to cooperate, in good faith, with the
9 Trustee regarding the qualification process for any proposed buyer and intends to qualify potential
10 prospect(s) in accordance with its ordinary practices.

11
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13
14 DATED: February 13, 2025

MARSHACK HAYS WOOD LLP

15 */s/ D. Edward Hays*

16 By: _____

17 D. EDWARD HAYS
18 BRADFORD N. BARNHARDT
19 Attorneys for Creditor,
20 HOUSER BROS. CO. dba RANCHO DEL
21 REY MOBILE HOME ESTATES
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PROOF OF SERVICE OF DOCUMENT

I am over the age of 18 and not a party to this bankruptcy case or adversary proceeding. My business address is:
870 Roosevelt, Irvine, CA 92620.

A true and correct copy of the foregoing document entitled: **JOINDER IN SUPPORT OF TRUSTEE'S MOTION TO AUTHORIZE SALE OF MANUFACTURED HOME CURRENTLY LOCATED AT 16222 MONTEREY LANE, SPACE 376, HUNTINGTON BEACH, CA 92649, DECAL NO. LBM1081, FREE AND CLEAR OF LIENS AND HOMESTEAD EXEMPTION** will be served or was served (a) on the judge in chambers in the form and manner required by LBR 5005-2(d); and (b) in the manner stated below:

1. TO BE SERVED BY THE COURT VIA NOTICE OF ELECTRONIC FILING (NEF): Pursuant to controlling General Orders and LBR, the foregoing document will be served by the court via NEF and hyperlink to the document. On **February 13, 2025**, I checked the CM/ECF docket for this bankruptcy case or adversary proceeding and determined that the following persons are on the Electronic Mail Notice List to receive NEF transmission at the email addresses stated below:

☒ Service information continued on attached page

2. SERVED BY UNITED STATES MAIL: On **February 13, 2025**, I served the following persons and/or entities at the last known addresses in this bankruptcy case or adversary proceeding by placing a true and correct copy thereof in a sealed envelope in the United States mail, first class, postage prepaid, and addressed as follows. Listing the judge here constitutes a declaration that mailing to the judge will be completed no later than 24 hours after the document is filed.

DEBTOR

JAMIE LYNN GALLIAN
16222 MONTEREY LN UNIT 376
HUNTINGTON BEACH, CA 92649

☐ Service information continued on attached page

3. SERVED BY PERSONAL DELIVERY, OVERNIGHT MAIL, FACSIMILE TRANSMISSION OR EMAIL: Pursuant to F.R.Civ.P. 5 and/or controlling LBR, on **February 13, 2025**, I served the following persons and/or entities by personal delivery, overnight mail service, or (for those who consented in writing to such service method), by facsimile transmission and/or email as follows. Listing the judge here constitutes a declaration that personal delivery on, or overnight mail to, the judge will be completed no later than 24 hours after the document is filed.

VIA PERSONAL DELIVERY:
PRESIDING JUDGE'S COPY

HONORABLE SCOTT C. CLARKSON
UNITED STATES BANKRUPTCY COURT
CENTRAL DISTRICT OF CALIFORNIA
411 WEST FOURTH STREET, SUITE 5130 /
COURTROOM 5C
SANTA ANA, CA 92701-4593

VIA EMAIL:
DEBTOR

JAMIE LYNN GALLIAN
jamiegallian@gmail.com

☐ Service information continued on attached page

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct.

February 13, 2025 Layla Buchanan

Date

Printed Name

/s/ Layla Buchanan

Signature

1. **TO BE SERVED BY THE COURT VIA NOTICE OF ELECTRONIC FILING (NEF):** CONTINUED:

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- **CHAPTER 7 TRUSTEE JEFFREY I GOLDEN (TR):** Jeffrey I Golden (TR lwerner@wgllp.com, jig@trustesolutions.net; kadele@wgllp.com
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- **INTERESTED PARTY COURTESY NEF:** Valerie Smith claims@recoverycorp.com
- **U.S. TRUSTEE:** United States Trustee (SA) ustpregion16.sa.ecf@usdoj.gov

4903-7392-5900, v. 1